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7 Attorneys for Defendant  
JASBIR S. THANDI

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

2 UNITED STATES OF AMERICA,  
3 Plaintiff,  
4 v.  
5 JASBIR S. THANDI,  
6 Defendant.

Case No. 4:23-cr-00428-JST

**STIPULATION AND ORDER (AS  
MODIFIED) REGARDING  
DEFENDANT JASBIR S. THANDI'S  
REQUEST FOR APPOINTMENT OF  
COUNSEL**

Judge: Hon. Jon S. Tigar

Trial Date: None Set

1 Plaintiff United States of America, together with Defendant Jasbir S. Thandi (the  
 2 “Parties”), respectfully stipulate and agree, subject to the Court’s approval, as follows:

3 On November 16, 2023, defendant Thandi was charged with Conspiracy to Commit  
 4 Insurance Fraud in violation of 18 U.S.C. § 371, Insurance Fraud in violation of 18 U.S.C. § 1033,  
 5 and Bank Fraud in violation of 18 U.S.C. § 1344. *Dkt. 1.*

6 On January 18, 2024, at an appointment of counsel hearing before the Court, Mr. Thandi  
 7 submitted an Expanded Declaration in Support of Attorney or Other Services Pursuant to the  
 8 Criminal Justice Act (the “Financial Affidavit”) in support of his request for Court-appointed  
 9 counsel under the Criminal Justice Act (“CJA”). *Dkt. 32.* The government objected to the  
 10 appointment of CJA counsel for Mr. Thandi.

11 At that hearing the Court provisionally appointed the above-captioned counsel as CJA  
 12 counsel to represent Mr. Thandi and ordered the parties to file briefing to enable the Court to  
 13 assess Mr. Thandi’s eligibility for CJA counsel. Mr. Thandi filed his Memorandum of Points of  
 14 Authorities in Support of his Request for Appointment of Counsel on February 16, 2024. *Dkt. 47.*  
 15 The government filed its response on March 18, 2024. *Dkt. 50.* Mr. Thandi’s reply is due by  
 16 March 25, 2024. *Dkt. 49.*

17 Counsel for Mr. Thandi has informed the government that Mr. Thandi has decided to retain  
 18 counsel and to withdraw his request for appointed counsel.

19 The government does not object to the Court permitting Mr. Thandi to withdraw his  
 20 request for appointed counsel.

21 Mr. Thandi respectfully requests that the Court permit him to withdraw his request for  
 22 Court-appointed counsel under the CJA, including his Financial Affidavit, and the Parties stipulate  
 23 and agree that the Court may enter the order proposed below. The Parties further stipulate and  
 24 agree that Mr. Thandi need not file reply papers in support of his request for Court-appointed  
 25 counsel under the CJA.

26 Further, given that the above-captioned counsel was provisionally appointed and Mr.  
 27 Thandi intends to obtain retained counsel, a further hearing for appointment of counsel is  
 28 necessary in this matter. The Parties also stipulate and agree, and respectfully request, that the

1 Court set a hearing for appointment of counsel on April 3, 2024 at 10:30 a.m., or as soon  
2 thereafter as the matter may be heard before Magistrate Judge Westmore.

3 **SO STIPULATED.**

4 DATED: March 25, 2024

ISMAIL J. RAMSEY  
United States Attorney

10 DATED: March 25, 2024

COBLENTZ PATCH DUFFY & BASS LLP

12 By: /s/ David J. Ward  
13 DAVID J. WARD  
14 Assistant United States Attorney

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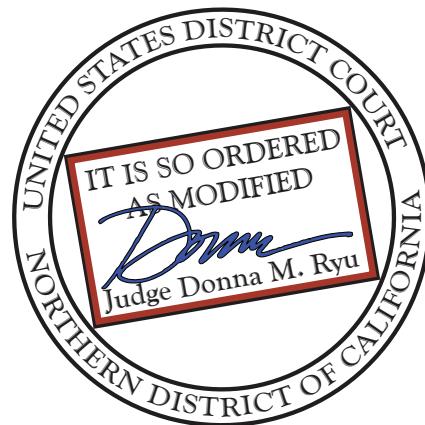
## **ORDER (AS MODIFIED)**

2       Based upon the stipulation of the Parties, and for good cause shown, the Court hereby  
3 orders that Mr. Thandi may withdraw his request for Court-appointed counsel under the CJA,  
4 including the Financial Affidavit submitted in support thereof, and that Mr. Thandi need not file  
5 reply papers in support of his request for appointed counsel. Mr. Thandi remains responsible for  
6 paying \$500.00 a month for his appointed attorney through the month of March, 2024 as previously  
7 ordered by the court on January 18, 2024 [Minute Order Docket No. 31, Initial Order Re:  
8 Contribution to Cost of Court-Appointed Counsel Docket No. 36]. Mr. Thandi does not need to  
9 make that payment starting April 1, 2024 because he has withdrawn his request for court appointed  
10 counsel.

11 The Court further sets a hearing for Mr. Thandi's substitution of counsel/identification of  
12 retained counsel on April 3, 2024 at 10:30 a.m. before Magistrate Judge Westmore.

## **IT IS SO ORDERED AS MODIFIED.**

**16** | DATED: March 26, 2024



DONNA M. RYU  
Chief Magistrate Judge